

EXHIBIT 2—McDonald/Hall Email Chain

EXHIBIT 2— McDonald/Hall Email Chain

Thursday, May 19, 2016 at 4:22:24 PM Eastern Daylight Time

Subject: FW: Allegiant/Kinzer

Date: Monday, April 4, 2016 at 3:09:52 PM Eastern Daylight Time

From: Mike Pangia

To: Douglas Desjardins, Joseph Anderson (janderson@andersonpangia.com)

From: Sean W. McDonald [mailto:SMcDonald@theurbanlawfirm.com]

Sent: Friday, April 01, 2016 2:57 PM

To: Hall, Veronica Arechederra (Las Vegas)

Cc: Dullea, Erik M. (Denver); Mike Pangia

Subject: RE: Allegiant/Kinzer

Veronica,

Slight adjustment to the below regarding deposition scheduling. We can commit to depositions of the flight crew on the subject flight between April 25-27, with or without Allegiant's written discovery beforehand. Additionally, our client can be available during that period of time for a deposition, as well.

Regards,

Sean W. McDonald

Associate Attorney

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From: Sean W. McDonald

Sent: Thursday, March 31, 2016 12:03 PM

To: 'Hall, Veronica Arechederra (Las Vegas)'

Cc: Dullea, Erik M. (Denver); Mike Pangia (mpangia@pangialaw.com)

Subject: RE: Allegiant/Kinzer

Veronica,

I have copied lead counsel on this email so he is kept in the loop.

Discovery responses were served by mail on March 28. I would think you should have them by today, if you

haven't already received them, but they are in the mail.

We will conditionally agree to your request to an extension on Allegiant's written discovery responses if you will agree to not fix deposition dates until we have the written responses in hand and if you will agree to a stipulated protective order regarding some of the document production requests. Regarding a protective order, you will see in the responses to the document production requests that there are some concerns about access to some of Mr. Kinzer's medical records and other sensitive materials. Mr. Kinzer will execute the releases you supplied, but only within the confines of a protective order and with a condition that any materials obtained through the releases will be produced to Plaintiff.

In terms of dates of availability for depositions, counsel who will be conducting the depositions tentatively have availability in the last week of April and the first two weeks of May. Obviously if written discovery isn't served until April 15, the last week of April may be too close to any deposition dates to allow a reasonable amount of time to digest the written materials or to discuss any potential concerns with written responses. But we did want to start coordinating dates in a spirit of cooperation.

Regarding a mutual exchange of documents, you should see some documents once written discovery responses have arrived.

Regards,

Sean

Sean W. McDonald

Associate Attorney

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From: Hall, Veronica Arechederra (Las Vegas) [<mailto:Veronica.Hall@jacksonlewis.com>]

Sent: Wednesday, March 30, 2016 2:49 PM

To: Sean W. McDonald

Cc: Dullea, Erik M. (Denver)

Subject: RE: Allegiant/Kinzer

Sean,

I am touching base with regards to my request below for proposed dates for Plaintiff's deposition. Given that we are not at the end of March, I need dates in late April.

In addition, I have not received Plaintiff's responses to Allegiant's interrogatories and request for production of documents, which were due to be served on Monday, March 28, 2016. Perhaps the responses are in route, and if you could let me know that would be great. With regards to Allegiant's responses to Plaintiff's interrogatories and request for production of documents, we are diligently working on those but need a two week extension (up to and including Friday, April 15, 2016) to serve the responses (including objections).

Finally, I would like to make a meaningful, mutual exchange of documents. As you will recall, in the initial disclosures, the parties generally identified documents but did not produce any documents. At a minimum, I expect Plaintiff has information in support of his damages claim, which I will need prior to taking his deposition. Similarly, Allegiant can produce Plaintiff's personnel documents and various policies and procedures.

I look forward to your response, and thank you for your anticipated courtesy and cooperation.

Veronica Arechederra Hall
Shareholder
Jackson Lewis P.C.
3800 Howard Hughes Parkway
Suite 600
Las Vegas, Nevada 89169

702-921-2460 | Main
702-921-2461 | Fax

Veronica.Hall@jacksonlewis.com
www.jacksonlewis.com

From: Sean W. McDonald [<mailto:SMcDonald@theurbanlawfirm.com>]
Sent: Friday, February 26, 2016 5:19 PM
To: Hall, Veronica Arechederra (Las Vegas)
Subject: RE: Allegiant/Kinzer

Veronica,

I'll speak with the client and co-counsel to arrange some dates.

When can we expect Allegiant's initial disclosures?

Sean W. McDonald

Associate Attorney

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From: Hall, Veronica Arechederra (Las Vegas) [<mailto:Veronica.Hall@jacksonlewis.com>]
Sent: Friday, February 26, 2016 3:03 PM
To: Sean W. McDonald
Subject: Allegiant/Kinzer

Sean,

I would like to schedule Plaintiff's deposition and recognize there are issues related to travel, etc. In addition, in March I am scheduled to attend a conference and vacation. As such, please propose dates in April.

Thank you.

Veronica Arechederra Hall
Shareholder
Jackson Lewis P.C.
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Las Vegas, Nevada 89169

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